

Claim 35 recites that the adhesive composition is sprayable. This characteristic is disclosed in the specification in the paragraph bridging pages 13 and 14. Cancelled claims 32 and 33 recited preferred solids content for an adhesive composition that would be sprayable, but the Examiner rejected those claims on the grounds that the solids content is measured in relation to fibrous web being dried, which lacked antecedent basis in the claims. New claim 35 merely recites that the composition is sprayable, and an example of the type of solids content that will provide sprayability is set forth in the specification.

Rejections over Kotani '560 or Kotani '029

Claims 1-3, 26 and 29 stand rejected as anticipated by or obvious over the two Kotani references. The Examiner has rejected the claims over each Kotani reference on the grounds that they disclose "essentially the same" compounds "made in essentially the same manner as the claimed adhesive." As applicants have previously argued, however, the Kotani patents are directed toward the production of gas barrier resin compositions, and [such compositions would not be useful as creping adhesives.] Most notably, the Kotani patents disclose the use of clay mineral as one component, and that component would destroy the compounds' usefulness as a creping adhesive.

In addition to the differences pointed out in prior responses, Applicants also note that the compounds of the Kotani references are cured, and therefore could not operate as adhesive compositions as claimed. The present claims, as amended, recite a "releasably" adhesive composition, meaning that while the composition has adhesive qualities it also allows creped products to be easily removed from the Yankee dryer with

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just a reasonable amount of tension. Obviously, the cured products of Kotani would not exhibit such releasable characteristics. There is also no teaching or suggestion in either Kotani reference that the described compositions would be sprayable. Indeed, Kotani teaches away from sprayability since those patents disclose curing the compounds.

Applicants respectfully submit that the current claims, as amended, recite a product significantly different from the disclosure of Kotani, and request withdrawal of these rejections.

Rejections over Hollenberg and Smigo

All of the claims stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hollenberg, or Smigo in combination with Hollenberg. Applicants respectfully traverse this rejection.

The Office Action asserts that Hollenberg teaches the same components as those recited in the present claims, and that therefore the method of cross-linking the polymer and cross-linking agent is presumed to be the same. Applicants respectfully submit that Hollenberg does *not* teach or suggest the same components as those recited in the claims, namely, Hollenberg does not teach or suggest the use of an organic polymer having primary and secondary amine groups in the polymer backbone.

As stated in response to the prior office action, Hollenberg expressly recites the use of polymers that may be crosslinked by ionic crosslinking. Thus, Hollenberg cannot teach or suggest the use of amine-containing polymers, as such polymers would cross-link with zirconium compounds via Lewis acid/Lewis base reaction involving covalent bonds.

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Hollenberg therefore teaches away from the use of the organic polymers recited in the present claims.

Contrary to the statements in the Office Action, Applicants are not distinguishing between Hollenberg and the present invention based solely on the nature of the cross-linking. Rather, Applicants are pointing out that the disclosure of Hollenberg does not encompass the present invention, because Hollenberg is limited to ionic cross-linking which one of skill in the art would understand to exclude the amine-containing polymers recited in the present claims. In contrast to Hollenberg, the present invention uses amine-containing polymers to achieve a type of cross-linking that is not suggested by Hollenberg.

As set forth in paragraph 6 of the Declaration of inventor Phuong Van Luu dated February 2, 2000, previously submitted in this application, substitution of a polymer containing a amine group into the process of Hollenberg would render that composition unusable as a creping adhesive. Contrary to the Examiner's assertion, such substitution does NOT result in the claimed composition, but instead would result in a gel that is neither a releasably adhesive compound, nor a sprayable compound. While the Examiner's suggested substitution in Hollenberg results in the use of the same components, Hollenberg discloses mixing the components prior to contacting the Yankee dryer, and thus would not result in a composition having the claimed properties.

The combination of Hollenberg with Smigo does not cure this defect in the Hollenberg disclosure. Smigo also does not teach mixing compounds in such a manner that the combination of an amine-containing polymer with a zirconium cross-linking agent would result in a releasably adhesive compound that is sprayable. As Applicants

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have previously argued, Smigo also does not provide quantities of cross-linking agent that would be useful for an adhesive, and there is not motivation or suggestion to even combine Smigo and Hollenberg to attain this purpose.

In view of the foregoing remarks, Applicants request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims. Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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APPENDIX

IN THE CLAIMS:

Please amend claim 1 as follows:

1. [An] A releasably adhesive composition comprising an organic polymer having in the polymer backbone amine groups selected from the group consisting of primary and secondary amine groups and mixtures thereof and a crosslinking agent for crosslinking the polymer to a fibrous web, said agent being selected from zirconium compounds wherein the zirconium has a valence of plus four.

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